

FILED  
Clerk  
District Court

DEC 20 2005

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

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KRISTIN D. ST. PETER  
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Commonwealth of the Northern Mariana Islands  
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Attorneys for: **Defendants CNMI, Nicole Forelli and D. Douglas Cotton**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Case No. 05-0027

Plaintiff,

vs.

**DEFENDANTS COMMONWEALTH OF  
THE NORTHERN MARIANA ISLANDS,  
NICOLE FORELLI AND D. DOUGLAS  
COTTON'S UNOPPOSED MOTION TO  
WITHDRAW MOTIONS TO QUASH  
AND/OR DISMISS AND CANCEL  
SCHEDULED HEARING**

COMMONWEALTH OF THE NORTHERN  
MARIANA ISLANDS, NICOLE C. FORELLI,  
WILLIAM C. BUSH, D. DOUGLAS COTTON,  
L. DAVID SOSEBEE, ANDREW CLAYTON,  
UNKNOWN AND UNNAMED PERSONS IN  
THE CNMI OFFICE OF THE ATTORNEY  
GENERAL, ALEXANDRO C. CASTRO, JOHN  
A. MANGLONA, TIMOTHY H. BELLAS,  
PAMELA BROWN, ROBERT BISOM, AND  
JAY H. SORENSEN,

Defendants.

**MOTION**

Now Comes, the Commonwealth of the Northern Mariana Islands Attorney General's Office  
on behalf of Defendants Commonwealth of the Northern Mariana Islands ("CNMI"), Nicole Forelli  
and D. Douglas Cotton (hereafter collectively "Defendants") and move to withdraw their individual

1 Motions to Quash or Dismiss Plaintiff Robert D. Bradshaw's Summons and Complaint in the above  
2 entitled action on the grounds of defective service. On or around December 16, 2005, Plaintiff  
3 substantially cured the service defect, which served as the basis for Defendants' individual motions to  
4 quash and/or dismiss.

5 In the interest of judicial economy and not wanting to waste this honorable Court's valuable  
6 time, Defendants hereby move to withdraw their individual Motions to Quash and/or Dismiss and  
7 request that this Court cancel hearings currently set for December 22, 2005.

8 Because Plaintiff does not own a facsimile machine and the weather in Idaho is inclement,  
9 Defendants are unable to offer a stipulation in support of this motion at this time. As an officer of the  
10 Court, the undersigned Assistant Attorney General advises that she spoke with Plaintiff Robert  
11 Bradshaw on December 20, 2005 at approximately 8:00 a.m. local time, and this motion is unopposed.

12 In order to satisfy filing deadlines prescribed by this Court, Defendants intend to submit a  
13 motion to dismiss on Federal Rule of Civil Procedure 12 (b)(6) grounds on or before December 22,  
14 2005.

15  
16 Respectfully submitted,

17 OFFICE OF THE ATTORNEY GENERAL

18  
19 Dated: December 20, 2005.

20  
21 By  \_\_\_\_\_

22 Kristin D. St. Peter


**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing was served, via U.S. Mail, on the

20 day of December, 2005, upon the following:

ROBERT D. BRADSHAW  
Plaintiff, Pro Se  
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\_\_\_\_\_  
Kristin D. St. Peter  
Assistant Attorney General